

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HOLLY RYDMAN, individually and on
behalf of a class of similarly situated
individuals,

Plaintiffs,

v.

CHAMPION PETFOODS USA, INC. a
Delaware corporation, and CHAMPION
PETFOODS LP, a Canadian limited
partnership,

Defendants.

NO. 2:18-CV-1578-TSZ

STIPULATION AND ORDER DISMISSING
DEFENDANT CHAMPION PETFOODS LP
AND STIPULATION AS TO EVIDENCE

NOTE ON MOTION CALENDAR:
July 26, 2023

Plaintiff Holly Rydman and Defendants Champion Petfoods USA, Inc. and Champion Petfoods LP (together, the “Parties”), by and through their respective counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) respectfully file this Stipulation of Voluntary Dismissal of Defendant Champion Petfoods LP and Stipulation as to Evidence. In support thereof, the parties state as follows.

1. Given that at this stage Plaintiff’s claims are directed to her purchase of dog food produced at Champion Petfoods USA Inc.’s DogStar kitchen in Kentucky, the Parties stipulate that Plaintiff voluntarily dismisses Canadian entity Defendant Champion Petfoods LP from this

STIPULATION AND ORDER DISMISSING DEFENDANT
CHAMPION PETFOODS LP AND STIPULATION AS TO
EVIDENCE - 1
NO. 2:18-CV-1578-TSZ

CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). The Parties agree that, within
2 ten (10) days of the filing of the stipulation, Plaintiff shall file an amended complaint that reflects
3 the agreement of this stipulation.

4 2. The Parties agree that they reserve all rights to utilize, and all objections to the use
5 of, all evidence that in any way relates to or was obtained from Champion Petfoods LP, as if
6 Champion Petfoods LP were still a defendant in this case, including, but not limited to: ESI
7 produced by Champion Petfoods LP, deposition testimony from Champion Petfoods LP
8 employees, and deposition testimony related to Champion Petfoods LP's NorthStar products and
9 manufacturing practices.

10 3. The parties agree that this stipulation will not be shown or read to the jury.

11 DATED July 26, 2023.

12 CAIRNCROSS & HEMPELMANN, P.S.

13
14 /s/ Binah B. Yeung

15 Binah B. Yeung, WSBA No. 44065

16 Email: byeung@cairncross.com

Jonathan D. Tebbs, WSBA No. 53861

17 Email: jtebbs@cairncross.com

524 Second Avenue, Suite 500

18 Seattle, WA 98104-2323

Telephone: (206) 587-0700

Facsimile: (206) 587-2308

19 Attorneys for Defendants

WINSTON & STRAWN LLP

/s/ David A. Coulson

David A. Coulson*

Jared R. Kessler*

Elisa H. Baca*

200 S. Biscayne Boulevard, Suite 2400

Miami, FL 33131

Tel: (305) 910-0500

Email: DCoulson@winston.com

Email: JRKessler@winston.com

Email: EBaca@winston.com

Attorneys for Defendants

*Admitted Pro Hac Vice

BRESKIN JOHNSON TOWNSEND, PLLC

/s/ Brendan W. Donckers

Brendan W. Donckers, WSBA No. 9406

Roger Townsend, WSBA No. 25525

1000 Second Avenue, Suite 3670

Seattle, WA 98104

Tel: (206)652-8660

Email: bdonckers@bjtlegal.com

Email: rtownsend@bjtlegal.com

Attorneys for Plaintiff

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

/s/ Rebecca A. Peterson

Rebecca A. Peterson, California Bar No. 241858

Robert K. Shelquist*

Rebecca A. Peterson*

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

Email: rkshelquist@locklaw.com

Email: rapeterson@locklaw.com

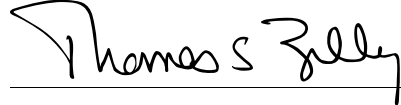
Attorneys for Plaintiff

*Admitted Pro Hac Vice

ORDER

It is so ORDERED.

DATED: August 4, 2023.



Thomas S. Zilly
United States District Judge

Presented by:

CAIRNCROSS & HEMPELMANN, P.S.

/s/ Binah B. Yeung

Binah B. Yeung, WSBA No. 44065

Email: byeung@cairncross.com

Jonathan D. Tebbs, WSBA No. 53861

Email: jtebbs@cairncross.com

524 Second Avenue, Suite 500

Seattle, WA 98104-2323

Telephone: (206) 587-0700

Facsimile: (206) 587-2308

Attorneys for Defendants